

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

|                     |   |                      |
|---------------------|---|----------------------|
| ROBERT STOUD,       | : |                      |
|                     | : |                      |
| Plaintiff           | : | CIVIL ACTION - LAW   |
|                     | : |                      |
| v.                  | : |                      |
|                     | : |                      |
| SUSQUEHANNA COUNTY, | : | NO. 3:17-CV-2183-MEM |
|                     | : |                      |
| Defendant           | : |                      |

BRIEF IN OPPOSITION PLAINTIFF’S MOTION IN LIMINE TO PERMIT  
QUESTIONING OF COMMISSIONERS HALL, ARNOLD, AND WARREN  
RELATED TO LIES AND INACCURACIES IN EEOC RESPONSE

Defendants, Susquehanna County, through its Attorneys, Kreder Brooks  
Hailstone LLP, hereby file the following Brief in Opposition to Plaintiff’s Motion  
in Limine:

Plaintiff seeks to question Commissioners Allan Hall, Elizabeth Arnold and  
former Commissioner MaryAnn Warren about “lies and inaccuracies” in the  
County’s response to Mr. Stoud’s Equal Employment Opportunity Commission  
(EEOC) Complaint. Plaintiff bases this demand on the allegations in a Complaint  
filed by a disgruntled former County Solicitor, Michael Giangrieco in May of this  
year. Mr. Giangrieco has made wild accusations against the former defense

counsel for the County alleging the statement filed in response to Stoud's EEOC complaint was, in his mind, inaccurate. The Complaint offers no further information about the alleged inaccuracies.

The EEOC, after its investigation, determined that it was unable to determine whether there was a violation of Plaintiff's rights and issued a "right to sue" letter in September of 2017. At no time did Attorney Giangrieco take any steps to remedy the alleged inaccuracies. In fact, he made the public claims of alleged "inaccuracies and lies" only after he had been replaced as County Solicitor in 2020 and filed suit against the County.

The introduction of the EEOC Complaint and the Response thereto would unfairly prejudice the Defendant and serve only to confuse the Jury. Additionally, any questions regarding the response to the EEOC Complaint would require the County to waive attorney-client privilege.

WHEREFORE, the Susquehanna County respectfully request the Court to issue an Order denying Plaintiff's Motion in Limine to Permit Questioning of Commissioners Hall, Arnold, and Warren Related to Lies and Inaccuracies in EEOC Response.

Respectfully submitted,

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By /s/ A. James Hailstone  
A. James Hailstone  
Attorney I.D. #80055

CERTIFICATE OF SERVICE

AND NOW, this 28<sup>th</sup> day of August, 2020, A. James Hailstone, a member of the firm of Kreder Brooks Hailstone LLP, electronically filed the foregoing Brief in Opposition with the Clerk of the United States District Court for the Middle District of Pennsylvania using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address(es):

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